



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901Certified Mail No. 7001 0320 0002 4541 1288
Return Receipt Requested

DEC 02 2003

In Reply Refer to: Associated Plating Co.
CAD043079110Ms. Diana Crane
Quality Manager
Associated Plating Co.
9636 Ann St.
Santa Fe Springs, CA 90670Re: Request for Information Pursuant to 3007(a) of the Resource Conservation and Recovery Act

Dear Ms. Crane:

The purpose of this letter is to direct you or another duly authorized representative of the facility to respond in writing to this request for additional information concerning the hazardous waste inspection conducted at your facility by EPA and the Santa Fe Springs Fire Department inspectors on November 17, 2003.

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927(a), the United States Environmental Protection Agency ("EPA") may require persons subject to RCRA to furnish information necessary for EPA to administer the Act. Pursuant to EPA's authority set forth in Section 3007(a), you are requested to submit the following information:

1. In the print-outs you provided the inspectors, 186 containers of waste were identified. Please provide the following information regarding these containers:
 - the waste codes (RCRA and/or non-RCRA, California only) for the contents of each container;
 - the accumulation start date (i.e., when the container was first filled with the waste) with any available documentation, for each container.
2. Please provide EPA copies of all hazardous waste manifests for the years 2001, 2002 and 2003;
3. Please provide EPA with copies of training records as described in Title 22 of the California Code of Regulations §66265.16(d)(1)-(4), that is:
 - the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - a written job description for each position listed;

- a written job description for each position listed;
 - a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
 - records that document that the training or job experience required have been completed.
4. Please conduct a hazardous waste determination, as required under Title 22 of the California Code of Regulations §66262.11, and provide EPA with the results (including waste code and accumulation start date (if hazardous)) for the following wastes:
- Spent filters from the nickel baths;



- Oily liquid in open, 5-gallon green bucket and open, 5-gallon black bucket, by Line 1;



- Oily liquid in open, 5-gallon blue bucket, with label "electroless Ni solution", by Line 1;



- Yellow liquid in 2 30-gallon white open container and 1 10-gallon, white open container, by Line 1;



- Contents of unlabeled, black 55-gallon drum, by Line 1;



- Contents of unlabeled, white 55-gallon drum, by Line 1;



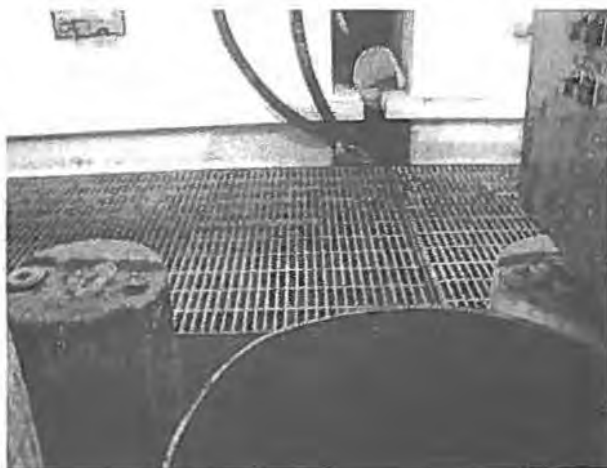
- Nickel filters in box, by Line 1;



- Contents of open, black 55-gallon drum, by Line 1;



- Contents of two unlabeled carboys, by Line 1;



- Contents of open, 55-gallon drum between Lines 1 and 3;



- Contents of 3 open, black containers between Lines 1 and 3;



- Contents of 4 55-gallon plastic drums, dated "3/03" and labeled "copper floor", between Lines 1 and 3;



- Contents of 2 open black 15-gallon containers and 1 open 5-gallon white bucket between Lines 1 and 3;



- Contents of open 5-gallon green bucket between Lines 1 and 3;



- Contents of 2 (1 open, 1 closed) white 5-gallon buckets, 1 black cylinder, 1 open blue 5-gallon bucket by Line 2;



- Contents of two open, unlabeled 5-gallon buckets (1 white, 1 red) by Line 2;



- Spent blasting media from sand blaster;



- Contents of open, 5-gallon white bucket in Maintenance Supplies Room;



- Contents of 2 white open 5-gallon buckets, 1 open 7-gallon red bucket, and one blue container by Line 3, north side;



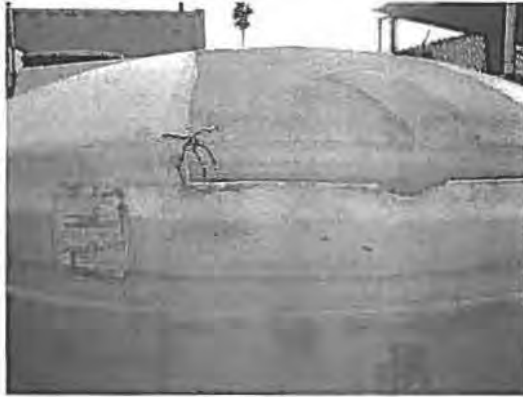
- Contents of open blue container, north side of building;



- Contents of all 21 55-gallon drums in the outside stripping area;



- Contents of white, open, polyurethane domed tank in waste storage yard (along with documentation of accumulation start date);



- Contents of 4 unmarked 55-gallon drums behind the polyurethane tank;



- Contents of one blue, open drum in front of decommissioned cadmium holding tanks;



- Contents of two holding tanks in outdoor storage area;



- Contents of 12 unlabeled 55-gallon drums along south wall by facility's wastewater treatment plant;



- Contents of laboratory waste containers;



Section 3008 of RCRA, 42 U.S.C. 6928, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response with this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.


This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See, also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a).

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to EPA within **twenty-one (21)** calendar days from the date of receipt of this letter. Please address the submittal to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Section
U.S. Environmental Protection Agency,
75 Hawthorne Street
San Francisco, CA 94105

If you have any questions regarding this matter, please contact Clint Seiter at (415)972-3298. Your cooperation in this matter is appreciated.

Sincerely,


for Frances Schultz, Manager
RCRA Enforcement Office

cc: Steve Lavinger, DTSC
Richard Kallman, Santa Fe Springs Fire Department

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Ms. Diana Crane
Quality Manager
Associated Plating Co
9636 Ann St.
Santa Fe Springs, CA 90670*

2. Article Number (Copy from service label)

7001 0320 0002 1541 1288

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

RAMONA BAIK

B. Date of Delivery

12-9-03

C. Signature

X Ramona Baik

☐ Agent

☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

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CERTIFIED MAIL RECEIPT**

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Total Postage & Fees \$

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Sent To

Associated Plating Co

Street, Apt. No.,
or PO Box No.

9636 Ann St.

City, State, ZIP

Santa Fe Springs, CA 90670

PS Form 3800, January 2001

See Reverse for Instructions